

IN THE UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION

**DANNY BRIDGEWATER, Individually and on  
behalf of all Others Similarly Situated; and  
COTY DAVID, Individually**

**PLAINTIFFS**

vs.

No. 5:15-cv-975-RP

**GES GLADIATOR ENERGY SERVICES TEXAS, LLC;  
LA CHEMICAL, LLC; and STEVEN "CLOY" GANTT,  
Individually and as an Officer of GES GLADIATOR  
ENERGY SERVICES TEXAS LLC, and LA CHEMICAL, LLC**

**DEFENDANTS**

**JOINT ADR REPORT**

COMES now Plaintiff Danny Bridgewater, individually and on behalf of all others similarly situated, and Coty David, individually, by and through their attorney Josh Sanford of Sanford Law Firm, PLLC, and Defendant GES Gladiator Energy Services Texas, LLC; LA Chemical, LLC; and Steven "Cloy" Gantt, individually and as an officer of GES Gladiator Energy Services Texas, LLC, and LA Chemical, LLC, by and through their attorneys Roy Barrera III, Shawn C. Golden and David A. Harris of Golden & Barrera, P.C., and for their Joint ADR Report, they do hereby state and allege as follows:

1. Status of Settlement Negotiations. Plaintiff will send a formal settlement demand on October 31, 2016, per the Court's scheduling order, ECF No. 40, and the parties will continue this process until a resolution is reached or until the parties reach an impasse.

2. Whether ADR is Appropriate in this Case. ADR would be appropriate for this case, when the parties are ready.

3. Method of ADR. The parties agree that private mediation would likely be the best method of ADR in this case. The Parties' counsel need to confirm whether their clients would agree to mediation, and the Parties have not decided or agreed upon a provider or compensation for the provider or whether ADR would be productive in this case. A private mediator with expertise in the Fair Labor Standards Act is desirable. Both parties would consider consenting to the use of a Magistrate Judge for mediation.

Respectfully submitted,

**DANNY BRIDGEWATER, Individually and  
on behalf of all Others Similarly Situated,  
and COTY DAVID, Individually, PLAINTIFFS**

SANFORD LAW FIRM, PLLC  
ONE FINANCIAL CENTER  
650 SOUTH SHACKLEFORD, SUITE 411  
LITTLE ROCK, ARKANSAS 72211  
TELEPHONE: (501) 221-0088  
FACSIMILE: (888) 787-2040

By: /s/ Josh Sanford  
Josh Sanford  
Tex. Bar No. 24077858  
josh@sanfordlawfirm.com

And

**GES GLADIATOR ENERGY SERVICES  
TEXAS, LLC, LA CHEMICAL, LLC, and  
STEVEN "CLOY" GANTT, DEFENDANTS**

GOLDEN & BARRERA, P.C.  
424 East Nueva  
San Antonio, Texas 78205  
Tel. 210-244-5858  
Fax 210-802-4633

By: /s/ David A. Harris (by permission)  
David A. Harris  
Texas Bar No. 24074366  
dharris@golden-barrera.com  
Shawn C. Golden  
Texas Bar No. 24038922  
sgolden@golden-barrera.com  
Roy Barrera III  
Texas Bar No. 24028545  
rbarrera@golden-barrera.com

**CERTIFICATE OF SERVICE**

I, Josh Sanford, do hereby certify that a true and correct copy of the foregoing pleading was electronically filed with the Clerk for the U.S. District Court, Western District of Texas, on October 3, 2016, using the electronic case filing system of the Court. The attorneys listed below are registered to receive an electronic copy hereof.

Roy Barrera III, Esq.  
Shawn C. Golden, Esq.  
David A. Harris, Esq.  
GOLDEN & BARRERA, P.C.  
424 East Nueva  
San Antonio, Texas 78205  
Tel. 210-244-5858  
Fax 210-802-4633  
rbarrera@golden-barrera.com  
sgolden@golden-barrera.com  
dharris@golden-barrera.com

/s/ Josh Sanford  
**Josh Sanford**